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December 15, 2020

Via ECF

The Honorable Arlene R. Lindsay, U.S.M.J.
United States District Court
Eastern District of New York
814 Federal Plaza,
Central Islip, New York 11722

Re: *Allen v. Lodging Solutions, LLC, et al.*
Case No. 2:20-cv-00859

Dear Judge Lindsay,

We are counsel to Plaintiff. We write jointly with counsel for Defendants to provide a status report per Your Honor's Order regarding Docket No. 44.

At this time, the parties have agreed to utilize the services of Mr. Martin Scheinman, Esq. of Scheinman Arbitration & Mediation Services for a mediation. Though Defendants dispute that a collective or class is certifiable in this action, at the mediation, the parties may discuss a resolution that encompasses the claims of not only the Plaintiff, but also of a potential agreed-upon class or collective. Due to the holidays, and the mediator's busy schedule, the parties are "shooting for" a mediation date in February. In advance of this mediation, Defendants have already provided our office with not only Plaintiff's records, but also a sample of the time and payroll records of numerous other employees. These records are voluminous and cover a period of years. As such, additional time is required for our office to appropriately analyze these records in advance of mediation. Defendants have expressed that they are willing to provide us with the time that we need to do so.

Therefore, the parties respectfully request until March 15, 2021 to file a status report to apprise the Court of the results of mediation and/or its progress.

Respectfully submitted,

/s/ C.K. Lee

C.K. Lee, Esq.

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cc: all parties via ECF